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22 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
23 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
24 *Blythe Solar Power Project Unit 3, LLC and*
25 *Blythe Solar Power Project Unit 4, LLC*

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN FRANCISCO DIVISION

19 MMR GROUP, INC.,
20 MMR POWER SOLUTIONS, LLC and
21 SOUTHWESTERN POWER GROUP II, LLC,
22 Plaintiffs,

23 vs.

24 STA DEVELOPMENT, LLC (F/K/A SOLAR
25 MILLENNIUM, LLC), SOLAR TRUST OF
26 AMERICA, LLC, SOLAR MILLENNIUM AG,
27 SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC,
28 PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR
II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC
AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**TENTH STIPULATION TO
EXTEND DEFENDANTS'
TIME TO RESPOND TO
AMENDED COMPLAINT
AND [PROPOSED] ORDER**

**The Honorable Judge
Edward M. Chen**

1 Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
2 SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA
3 DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
4 CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
5 BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
6 UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
7 POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request
8 that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
9 filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
10 by two weeks from February 21, 2012 to March 6, 2012.

11 On November 4th and 14th, the parties requested, and this Court later granted, a one-week
12 extension of time for the STAD Defendants to respond to the Amended Complaint because the
13 parties were in advanced stages of settlement discussions. On November 22nd, December 1st,
14 December 27th, January 10th, January 20th, and February 3rd, the parties requested, and this Court
15 later granted, extensions of two weeks due to continued progress in settlement negotiations.

16 In December 2011, Solar Millennium AG – parent company of the STAD Defendants –
17 filed for bankruptcy in Germany. This has complicated the extensive settlement discussions
18 between Plaintiffs and STAD Defendants, which involve a deal with a third-party purchaser of
19 STA Development, LLC’s assets. Despite these complications, the parties remain optimistic that
20 a settlement is on the horizon and that they will execute a settlement agreement forthwith. Due to
21 the continued progress in reaching a settlement, the parties request a two-week extension of the
22 time for the STAD Defendants to respond to the Amended Complaint. The parties’ request will
23 have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties
24 therefore request that the Court extend the STAD Defendants’ time to respond to the Amended
25 Complaint by two weeks from February 21, 2012 to March 6, 2012.

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28

1 Dated: February 21, 2012

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18 Palo Verde Solar II, LLC, Blythe Solar Power Project
19 Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
20 Blythe Solar Power Project Unit 3, LLC and Blythe Solar
21 Power Project Unit 4, LLC*

22 Dated: February 21, 2012

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29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: _____

31 UNITED STATES DISTRICT JUDGE